

# ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Southwestern Bell Telephone ) CC Docket Nos. 85-229,  
Company's Comparably Efficient ) 90-623, and 95-20  
Interconnection Plan for the )  
Provision of Internet )  
Support Services )

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COMMENTS OF AT&T CORP.

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Pursuant to the Commission's Public Notice (DA 96-1031), released June 26, 1996, AT&T Corp. ("AT&T") submits these comments in response to Southwestern Bell Telephone Company's ("SWBT's") Comparably Efficient Interconnection ("CEI") plan for Internet support services. AT&T believes that the plan as filed cannot be considered until SWBT provides information sufficient to describe the enhanced service offering or offerings covered by the CEI plan.

SWBT's plan purports (pp. 2-3) to seek approval only for SWBT to provide Internet support services, which it defines as "customer sales, referrals, and billing" for its Internet service provider affiliate, Southwestern Bell Internet Services Inc. ("SBIS"). According to the plan, SWBT sales representatives will "describ[e] the affiliate's service, review[] service options, discuss[] pricing plans and refer[] callers to SBIS." SWBT's sales representatives will also take the appropriate steps to complete a sales

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transaction, while SBIS will be responsible for fulfilling any service orders and providing Internet services.

Although SWBT correctly states (p. 1) that the Commission's Computer III rules permit Bell Operating Companies to offer new enhanced services upon approval of service-specific CEI plans,<sup>1</sup> it is not clear whether any of the Internet support services SWBT proposes to offer are, in fact, enhanced. To the contrary, it appears that the specific services that SWBT intends to offer are not enhanced services.<sup>2</sup>

Furthermore, SWBT elsewhere in its plan (p. 3) describes what do appear to be enhanced Internet access services, but does not appear to seek CEI approval for those Internet access services -- presumably because those services are to be offered by SBIS, not SWBT.<sup>3</sup>

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<sup>1</sup> Bell Operating Companies' Joint Petition for Waiver of Computer II Rules, Memorandum Opinion and Order, 10 FCC Rcd 1724, 1730 (1995).

<sup>2</sup> See Amendment of Section 64.702 of the Commission's Rules and Regulations (Second Computer Inquiry), Final Decision, 77 F.C.C.2d 384, 420 (1980). Enhanced services are offerings which employ computer processing applications that act on the format, content, code, protocol, or similar aspect of the subscriber's transmitted information; provide the subscriber with additional, different, or restructured information; or involve subscriber interaction with stored information. Id. at 420-21.

<sup>3</sup> On August 3, 1995, SWBT did file a CEI plan for an Internet Access Service, only to withdraw that plan, without explanation, five months later. See SWBT's CEI


-3-

For the reasons stated above, the Commission should not approve SWBT's CEI plan until SWBT provides the necessary information to clarify which enhanced service or services are covered by the CEI plan, and amends its plan to address the specific enhanced service(s) for which it is seeking CEI approval.

Respectfully submitted,

AT&T CORP.

By



Mark C. Rosenblum

Ava B. Kleinman

Seth S. Gross

Its Attorneys

295 North Maple Avenue

Room 3245F3

Basking Ridge, New Jersey 07920

(908) 221-8312

July 26, 1996

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(footnote continued from previous page)

Plans for Internet Access, CC Docket Nos. 85-229, 90-623, and 95-20, filed August 3, 1995; See Letter to Mr. William F. Caton, Acting Secretary, Federal Communications Commission, from Sandra L. Wagner, SBC Communications, dated January 11, 1996, p. 2.

CERTIFICATE OF SERVICE

I, Rena Martens, do hereby certify that on this 26th day of July, 1996, a copy of the foregoing "Comments of AT&T" was mailed by U.S. first class mail, postage prepaid, to the parties listed below.

Robert M. Lynch  
Durward D. Dupre  
Michael J. Zpevak  
Robert J. Gryzmala  
Southwestern Bell Telephone Company  
One Bell Center  
Room 3520  
St. Louis, Missouri 63101

  
Rena Martens